

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re HERALD, PRIMEO and THEMA FUNDS
SECURITIES LITIGATION,

This Document Relates To:

ALL ACTIONS.

Civil Action No. 09 Civ. 289 (RMB) (HBP)
(Consolidated with 09 Civ. 2032 and
09 Civ. 2558)

ECF CASE

**DECLARATION OF ALBERT Y. CHANG IN SUPPORT OF LEAD PLAINTIFFS'
MOTION FOR LEAVE TO AMEND COMPLAINTS**

I, Albert Y. Chang, declare:

1. I am an attorney at the law firm of Johnson Bottini, LLP, Lead Counsel for Plaintiff Neville Seymour Davis in this action. I submit this declaration in support of Lead Plaintiffs' Motion For Leave To Amend Complaints. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would competently testify to these facts.

2. Attached as Exhibit A is a copy of Lead Plaintiff Repex Ventures S.A.'s [Proposed] Third Amended Class Action Complaint.

3. Attached as Exhibit B is a copy of the red-lined version between Lead Plaintiff Repex Ventures S.A.'s Third Consolidated Amended Complaint and its Amended Class Action Complaint (Docket No. 74).

4. Attached as Exhibit C is a copy of Lead Plaintiff Repex Ventures S.A.'s chart of its Proposed Added Defendants.

5. Attached as Exhibit D is a copy of Lead Plaintiff Dr. Shmuel Cabilly and Plaintiff Korea Exchange Bank's Second Consolidated Amended Complaint.

6. Attached as Exhibit E is a copy of the red-lined version between Lead Plaintiff Dr. Shmuel Cabilly and Plaintiff Korea Exchange Bank's Second Consolidated Amended Complaint and their Consolidated Amended Complaint (Docket No. 75).

7. Attached as Exhibit F is a copy of Lead Plaintiff Dr. Shmuel Cabilly and Plaintiff Korea Exchange Bank's chart of their Proposed Added Defendant.

8. Attached as Exhibit G is a copy of Lead Plaintiff Neville Seymour Davis's Second Amended Class Action Complaint, together with exhibits.

9. Attached as Exhibit H is a copy of the red-lined version between Lead Plaintiff Neville Seymour Davis's Second Consolidated Amended Complaint and his Amended Class Action Complaint (Docket No. 76).

10. Attached as Exhibit I is a copy of Lead Plaintiff Neville Seymour Davis's chart of his Proposed Added Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of April 2010, at San Diego, California.

/s/ Albert Y. Chang

Albert Y. Chang